

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

LANDWORKS CREATIONS, LLC.)	C.A. NO.05-CV-40072 FDS
)	
Plaintiff)	
)	
v.)	
)	
UNITED STATES FIDELITY AND GUARANTY)	
COMPANY and)	
LOVETT-SILVERMAN CONSTRUCTION)	
CONSULTANTS, INC.)	
)	
Defendants)	
)	

**PLAINTIFF LANDWORKS, LLC.'S EMERGENCY MOTION FOR EXTENSION OF
TIME TO RESPOND TO THE COURT'S ORDER OF FEBRUARY 27, 2007
COMPELLING FURTHER ANSWERS TO INTERROGATORIES AND FOR
RELIEF FROM THE REQUIREMENTS OF L.R. 7.1 AND 37.1 AS TO THIS
MOTION**

Now comes the Plaintiff, Landworks Creations, LLC and moves on an emergency basis for an extension of time to respond to the Order of the Judge Magistrate dated February 27, 2007, ordering the Plaintiff to provide further answers to discovery by February 28, 2007. As grounds for this motion, the Plaintiff notes that the Order was received at the office of Plaintiff's counsel by e-mail after 4:00 pm on the afternoon of February 27, 2007, and was opened at 1:30 pm on February 28, 2007. Plaintiff thus has less than four hours to review the Order and amend the Answers. In addition, Plaintiff's president is in Maine, at least two hours away.

Compliance with the Court's Order appears to be impossible. Indeed, the extremely short time-frame for compliance seems so short as to be an error in the Order, warranting review. Plaintiff understands that Magistrate Judge Hillman is not in Court on this day to review the time frame.

Based upon the short time frame of the Order, the Plaintiff request relief from the meet and confer obligations of Local Rule 7.1 and Local Rule 37.1

WHEREFORE, based upon the foregoing, the Plaintiff respectfully requests a reasonable extension of time to respond to the Court's Order, which should require no more than fourteen days.

Respectfully Submitted,
Landworks Creations, LLC
By its attorney,

s/Robert N. Meltzer
The Mountain States Law Group
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P.O. Box 1459
Framingham, MA 01701
Phone: (508) 872-7116

Dated: February 28, 2007

CERTIFICATE OF SERVICE

I, Robert N. Meltzer, do hereby certify that on this 28th of February, 2007 I served a copy of the foregoing on the following counsel of record by first class mail, postage prepaid:

Hermes, Netburn, O'Connor & Spearing
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Attn: Julie Ciollo, Esq.

s/Robert N. Meltzer_____

Robert N. Meltzer